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10 Attorneys for Plaintiff

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,) No. CR-06-00384-JF
15 Plaintiff,)
16 v.)
17 YUEQIANG CHEN,)
18 a/k/a Bill Chen,)
Defendant.)

)
)[PROPOSED] ORDER CONTINUING STATUS
DATE, DEEMING MATTER COMPLEX,
AND EXCLUDING TIME

19
20 1. On September 22, 2006, a stipulation for the continuance of the status date and to
21 exclude time was filed before the Honorable Jeremy Fogel, United States District Judge;

22 2. Counsel stipulated in support of this request that the pending indictment is part of
23 a larger investigation involving large amounts of complex documents and records in both paper
24 and computer formats. The discovery process has begun and the government has disclosed 4
25 CD's of material, as well as 366 pages of paper documents. Additional discovery is being
26 prepared for disclosure. The parties are engaged in ongoing communications and negotiations
27 and these may require disclosure of materials not contemplated by the discovery made for the
28 charges in the indictment. Further, the parties stipulate that the matter should be deemed

1 complex pursuant to 18 U.S.C. § 3161(h)(8)(B)(ii);

2 3. Both counsels agreed that the time between September 27, 2006 and November
3 15, 2006 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(8)(A) and (B)(i) and (ii);

4 Based upon the foregoing representations made by the parties by stipulated motion, and
5 good cause appearing therefor,

6 **IT IS HEREBY ORDERED** that the time between September 27, 2006 and November
7 15, 2006 shall be excluded from the computation the period within which the trial must
8 commence, for the reasons and based upon the statutory provisions set forth above, and for those
9 reasons proffered by the parties. The Court finds that the ends of justice outweigh the interests
10 of the public and the parties in a speedier trial based upon the grounds set forth above.

11 **IT IS FURTHER ORDERED** that this matter be deemed complex pursuant to 18
12 U.S.C. § 3161(h)(8)(B)(ii).

13 **IT IS FURTHER ORDERED** that the matter shall be removed from the Court's
14 calendar on September 27, 2006 and set for status on November 15, 2006, or a date thereafter at
15 the convenience of the Court.

16 DATED:

17 9/26/06



Jeremy Fogel
United States District Judge

18 Distribute to:

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